

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
TYLER DIVISION

ST. GREGORY CATHEDRAL SCHOOL;
ADK QUARTER MOON, LLC; LEXMI
HOSPITALITY, LLC; and SHRI BALAJI, LLC,
on behalf of themselves and all others similarly
situated,

Plaintiffs,

Case No. 6:12-CV-739

V.

LG ELECTRONICS, INC., a South Korean corporation, and LG ELECTRONICS U.S.A., INC., a Delaware corporation,

Defendants

[PROPOSED] SCHEDULING ORDER

Following the March 18, 2013 scheduling conference, the parties have conferred regarding a proposed schedule for the proceedings identified in the Court's case management plan. As previously noted (*see* Doc. No. 52), Defendants are evaluating the possibility of moving to strike Plaintiffs' class allegations. If such a motion is filed and ultimately granted, discovery related to class certification and a hearing on any class certification motion would not be required. Assuming a motion to strike Plaintiffs' class allegations is not granted, however, the parties propose the following dates for the proceedings identified below.

PRETRIAL EVENTS	COURT'S PROPOSED DATES	PARTIES' PROPOSED DATES
Rule 26(f) meeting*	March 4, 2013	March 4, 2013
File case management plan*	March 11, 2013	March 13, 2013
Rule 16(b) scheduling conference*	March 18, 2013	March 18, 2013
Deadline to file motions to dismiss	March 22, 2013	April 5, 2013

Deadline to serve initial disclosures relating to class certification issues	April 18, 2013	April 25, 2013 (by plaintiffs and LG USA) May 20, 2013 (by LG KR)
Deadline to exchange privilege logs related to class certification issues	May 24, 2013	June 7, 2013 (for non ESI documents)
Deadline to designate expert witnesses and reports on issues for which the party bears the burden of proof on class certification issues	May 24, 2013	September 6, 2013
Deadline for expert witnesses for which the party bears the burden of proof on class certification issues to be made available for deposition		October 4, 2013
Deadline to notify Court of mediator	May 24, 2013	May 1, 2013
Deadline to designate expert witnesses and reports on issues for which the party does not bear the burden of proof on class certification issues	June 18, 2013	November 8, 2013
Deadline for expert witnesses for which the party does not bear the burden of proof on class certification issues to be made available for deposition		December 2, 2013
Deadline to file objections to experts (including <i>Daubert</i> challenges)	August 1, 2013	December 31, 2013
Discovery deadline for class certification issues	August 1, 2013	December 9, 2013
Deadline to complete <u>required</u> mediation	August 8, 2013	May 2, 2014
Deadline for motion for class certification	August 16, 2013	January 31, 2014
Deadline for response to motion for class certification	September 6, 2013	March 17, 2014

Deadline for reply to motion for class certification	September 18, 2013	March 28, 2014
Deadline for Rule 26(a)(3) disclosures related to the class certification hearing	September 18, 2013	March 28, 2014
Deadline for Objections to 26(a)(3) disclosures	October 2, 2013	April 6, 2014
Deadline for Plaintiff to file proposed findings of fact and conclusions of law on the issues of class certification	October 2, 2013	April 18, 2014
Deadline for Defendant to file proposed findings of fact and conclusions of law on the issue of class certification	October 9, 2013	April 18, 2014
Class certification hearing	November 14, 2013 at 9:00 am in Tyler, Texas	May 22, 2014

DATED this 22nd day of March, 2013.

/s/ Jonathan R. Chally

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CERTIFICATE OF SERVICE

I hereby certify that on this date I electronically filed this **PROPOSED SCHEDULING ORDER** with the clerk of court for the United States District Court, Eastern District of Texas, using the electronic case filing system of the court. The electronic case filing system sent a “Notice of Electronic Filing” to the attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

Dated: March 22, 2013

/s/ Jonathan R. Chally
Jonathan R. Chally